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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

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SEP 22 1989

Federal Communications Commission
Office of the Secretary

In re Petition of

A.C. NIELSEN COMPANY

For Authority to Use Line 22
of the Active Portion of
the Television Video Signalling
to Transmit Encoded Program
Identification Signals

DA 89-1060

To: Chief, Mass Media Bureau

COMMENTS OF THE PUBLIC BROADCASTING SERVICE

1. The Public Broadcasting Service ("PBS") hereby submits its comments in response to the Commission's above-referenced public notice, released September 1, 1989, inviting comments on a request by the A.C. Nielsen Company ("Nielsen") for permissive authority for broadcast licensees to use Line 22 of the "active portion" of the television video signal to transmit encoded program identification signals. PBS is a non-profit membership organization whose members are the licensees of most of the nation's public television stations. PBS provides program distribution and other services to its members and often participates in Commission proceedings and industry activities dealing with the technical integrity of television broadcasting.

2. PBS in general opposes any use of the active picture area of the television signal for purposes other than video broadcast service, at least where the originator is not

the licensee of the television station.^{1/} First, even though the AMOL signal proposed by Nielsen may not disturb today's viewers because of picture overscan by television receivers, continuing improvements in the state of the art of NTSC television are moving in the direction of display of the entire active picture area. Receiver manufacturers have been able to reduce overscan significantly in recent years because of the stability of solid state components.^{2/} Moreover, if enhanced NTSC becomes the first step in the implementation of advanced TV systems, it is possible that the full active picture area will be displayed in the relatively near future, with the same 525 lines that are used today.

3. Second, if the type of non-video data signals that are now restricted to the vertical blanking interval

^{1/} Where the originator of the signal is the licensee of the broadcast station, the licensee can make a judgment for itself about the likelihood of interference to television viewing and presumably will not transmit non-video signals in the active picture area if it feels that there will be any such interference. However, when the signals primarily relate to an activity of an outside organization, the licensee's flexibility to transmit or not transmit the signal may be significantly reduced. In the case of Nielsen's AMOL signals, for example, there may be no flexibility at all as a practical matter, because despite Nielsen's claim that no broadcaster will be required to transmit AMOL, it will be economically damaging for a broadcaster to refuse to transmit if the result is inaccurate or incomplete audience ratings reports furnished to advertisers or underwriters.

^{2/} Substantial overscan was required in the days of tube-type receivers, because the aging of receiver components resulted in picture shrinkage. Overscan was necessary so that when the picture shrank, it would still fill the entire screen, and black borders would not appear around the picture.

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("VBI") are permitted to break into the active picture area, it may become difficult for the Commission to stop the encroachment at Line 22, as new uses are developed and the demand for signal capacity increases. Lines 23 and 24 will follow, and soon arguments will erupt over interference to the viewer. The edge of the VBI is a convenient demarcation point between non-video and video material. Once it is abandoned, a substitute demarcation point may be difficult to establish.

4. If the Commission, despite PBS's misgivings, decides to permit non-video material to be transmitted on Line 22, thus effectively expanding the VBI by one line, there is no reason to restrict that data to any one user or application. The signal capacity should be available to all users whose operations do not interfere with viewing of the picture. Although Nielsen and Airtrax, another prospective user of Line 22, have both argued that their operations are not compatible and each requires exclusive use of Line 22, it is not clear whether their systems are inherently incompatible or are incompatible only because their designers have not chosen to make them compatible. In any event, it is certainly not impossible in theory to have more than one kind of signal share the capacity of the two frames of one line. Any potential user should be able to present the merits of its system to broadcasters; and as long as no one type of use is given the sole regulatory right to use the line, it is

likely that users will get together on the issue of compatibility rather than risk being shut out altogether by the economically strongest among them. Indeed, broadcasters may force such cooperation among those wishing to use their transmission capacity.

5. In sum, PBS urges the Commission to encourage non-video operations to remain in the established VBI, to avoid impeding future improvements in NTSC video transmission and to avoid opening a Pandora's Box leading to a greater invasion of the active picture area. Alternatively, if the Commission decides to permit non-video use of Line 22, it should make that capacity available to any user that can operate without interfering with the visible picture or pre-existing non-program operations.

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CERTIFICATE OF SERVICE

I, Lucy S. Colebaugh, do hereby certify that I have mailed, on this 22nd day of September, 1989, postage-prepaid, copies of the foregoing Comments of The Public Broadcasting Service to the following:

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